

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States District Court  
Southern District of Texas  
FILED

JAN 18 2012

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

CRIMINAL NO.

CHARLES CANNON  
MICHAEL MCLAUGHLIN  
BRIAN KERSTETTER  
JOSEPH STAGGS

12 CR 025

INDICTMENT

COUNT ONE  
(18 U.S.C. § 249)

On or about August 13, 2011, in the Southern District of Texas, defendants

**CHARLES CANNON, MICHAEL MCLAUGHLIN,**

**BRIAN KERSTETTER, AND JOSEPH STAGGS**

while aiding and abetting each other, willfully caused bodily injury to Y.J., who is African American, because of his actual or perceived race, color, and national origin.

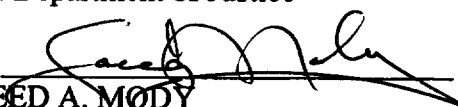
In violation of Title 18, United States Code, Section 249.

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

~~FOR~~ PERSON OF THE GRAND JURY

THOMAS E. PEREZ  
Assistant Attorney General  
Civil Rights Division  
U.S. Department of Justice

By:   
SABED A. MODY  
Trial Attorney  
U.S. Department of Justice